

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COLLEGE REPUBLICANS OF THE
UNIVERSITY OF WASHINGTON; and
CHEVY SWANSON, an Individual,

Plaintiffs,

v.

ANA MARI CAUCE, in her official capacity
as president of the University of Washington;
GERALD J. BALDASTY, in his official
capacity as provost and executive vice
president; RENE SINGLETON, individually
and in her official capacity as assistant director,
Student Activities; CHRISTINA COOP,
individually and in her official capacity as
senior activities advisor, Student Activities;
JOHN N. VINSON, individually and in his
official capacity as Chief of the University of
Washington, Seattle, Police Department;
CRAIG WILSON individually and in his
official capacity as University of Washington,
Seattle, Police Department Patrol Commander;
and DOES 1-25;

Defendants.

No. 2:18-CV-00189 MJP

DECLARATION OF STEFAN
PENTCHOLOV

1 I, Stefan Pentcholov, state as follows:

2 1. I am over the age of eighteen and competent to testify herein.

3 2. I have served as a Detective with different law enforcement agencies for a total of
4 32 years, with a focus on criminal intelligence and homeland security. I joined the University
5 of Washington Police Department (UWPD) in 2005, and currently am a UWPD Detective. I
6 also work as a liaison with the Federal Bureau Of Investigation (FBI) when the need arises. I
7 currently serve as a Reserve U.S. Coast Guard Special Agent. In this role, I am responsible for
8 a variety of complex investigations involving criminal law, military laws, regulations and
9 maritime laws, and homeland security. I have served with the U.S. Coast Guard since 1998,
10 graduated from the Federal Law Enforcement Academy, and trained accordingly. I have Top
11 Secret security clearances, which afford me access to data that affects national security,
12 counterterrorism/counterintelligence, or other highly sensitive data. Over the course of my
13 career, I have received extensive training and on-the-ground experience in complex
14 investigations, analyzing intelligence, and assessing potential security threats.

17 3. Through my extensive experience in federal and local law enforcement, I am
18 familiar with the different types of investigative methods and sources that detectives and
19 intelligence officers like me rely on in evaluating threat levels for an upcoming event. The
20 Internet is one of law enforcement's best resources because it provides an efficient way to
21 gather intelligence about individuals and organizations involved with an event from a variety of
22 different sources that would otherwise not be known and/or readily accessible. Social media
23 and online forums are unique in that they allow law enforcement to learn about real-time
24 conversations among individuals of interest without influencing the conversation. Officers rely
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1 on their expertise to assess the reliability of open sources, monitor for trends, and stay apprised
2 of new developments in the days and hours leading up to an event.

3 4. When needed, I serve as a liaison between UWPD and the FBI. In evaluating
4 event factors and determining appropriate security measures for events on campus, UWPD may
5 consider intelligence and analysis provided by the FBI. In those instances, I communicate with
6 the FBI to obtain their latest intelligence and analysis, and then work with the UWPD team to
7 incorporate what we learn from the FBI into the security planning process. By working with the
8 FBI in this way, UWPD is able to make use of the FBI's intelligence network and resources in
9 assessing potential security threats and to identify any inconsistencies with UWPD's own
10 intelligence that may require further investigation.
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12 5. I was directly involved in the planning for the February 10, 2018 Patriot Prayer
13 rally hosted by the University of Washington College Republican. During UWPD's planning
14 for the Patriot Prayer event, I was in regular contact with the FBI regarding the latest
15 intelligence and analysis on potential security threats at the rally. UWPD Chief of Police
16 Vinson and I exchanged communications with the FBI multiple times each day during the week
17 leading up to the rally and assessed whether and how the FBI's intelligence might impact
18 UWPD's research and analysis. I attended daily meetings with UWPD leadership the week
19 before the event. At that time, Chief Vinson and I confirmed that the FBI's intelligence was
20 consistent with publicly available information that UWPD was relying on, including the risk
21 that Patriot Prayer and Proud Boys members attending the event might be armed.
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1 I declare under penalty of perjury under the laws of the State of Washington that the
2 foregoing is true and correct to the best of my knowledge.

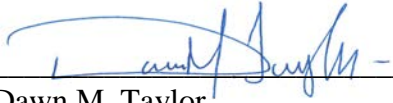
3 Dated this 26th day of March, 2018.

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6 STEFAN PENTCHOLOV
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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of March, 2018, I electronically filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system which will send notification of such filing to all parties who are registered with the CM/ECF system.

DATED this 27th day of March, 2018.


Dawn M. Taylor